

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

XINLU FAN, LIANG'E FAN,
SHAOCHUN FU, JIANHUA GU,
FENYING LI, MINGXIA LI, YONGNIAN
SHI, CHENLIN WANG, SHUWEN WU,
HAIJUN ZHOU, and XIAOFANG ZHOU,

Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION;
QUARTZBURG GOLD, LP; ISR
CAPITAL, LLC; IDAHO STATE
REGIONAL CENTER, LLC; and SIMA
MUROFF,

Defendants.

U.S. BANK NATIONAL ASSOCIATION,

Crossclaimant,

v.

QUARTZBURG GOLD, LP; and IDAHO
STATE REGIONAL CENTER, LLC,

Crossclaim
Defendants.

NO. 2:19-cv-01545-RSM

**STIPULATION AND ORDER
REGARDING CLASS
CERTIFICATION DEADLINES**

STIPULATION AND ORDER RE:
CLASS CERTIFICATION DEADLINES
2:19-cv-01545-RSM

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1 Plaintiffs and Defendants identified below, who are all parties who have appeared in this
2 action, by and through their undersigned counsel, hereby stipulate and agree that the deadline for
3 the Motion to Certify Class, currently scheduled for August 14, 2020, should be continued until
4 September 25, 2020; that the deadline for any Opposition to Motion to Certify Class, currently
5 scheduled for September 11, 2020, should be continued to October 23, 2020; and that the deadline
6 for any Reply in Support of Motion to Certify Class, currently scheduled for October 9, 2020,
7 should be continued until November 20, 2020. These stipulated and agreed deadlines would
8 amend the existing deadlines ordered by this Court pursuant to the parties' prior Stipulation and
9 Order Regarding Class Deadlines (Dkt. #47).

10 As previously explained in the parties' prior stipulations regarding class certification
11 deadlines, Defendant U.S. Bank National Association has noticed the deposition of the putative
12 class representative and has agreed to take the deposition remotely, over videoconference.
13 However, Plaintiffs' counsel has represented that the putative class representative cannot be
14 deposed in China, even remotely, because depositions in China are illegal, and has further
15 represented that the putative class representative is currently prohibited from traveling to another
16 location for the deposition at this time due to travel and other restrictions resulting from the global
17 COVID-19 pandemic. Plaintiffs' counsel has represented that the restrictions that were in place
18 as of the filing of the parties' prior stipulations remain in place as of this filing, but that the putative
19 class representative may be able to be deposed in September. The parties agree that there is good
20 cause for this request because U.S. Bank believes it is entitled to take the deposition of the putative
21 class representative before class certification is briefed but the putative class representative
22 remains unavailable to be deposed at this time. This Stipulation is without waiver of any party's
23 right to seek further extensions or other relief.

24 For these reasons, the parties hereto stipulate and agree to, and respectfully and jointly
25 request entry of, the Order set forth below.

Respectfully submitted this 11th day of August, 2020.

/s/ Shawn Larsen-Bright

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***Attorneys for Defendants Quartzburg Gold,
LP, ISR Capital LLC and Idaho State
Regional Center, LLC***

ORDER

Based upon the foregoing Stipulation, and for good cause shown, it is hereby ORDERED that the deadline for the Motion to Certify Class is hereby continued until September 25, 2020; that the deadline for any Opposition to Motion to Certify Class is hereby continued to October 23, 2020; and that the deadline for any Reply in Support of Motion to Certify Class is hereby continued until November 20, 2020.

IT IS SO ORDERED this 11th day of August, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

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LP, ISR Capital LLC and Idaho State
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DATED this 11th day of August, 2020.

/s/ Molly Price

Molly Price, Legal Assistant